

## REMARKS

1. Applicant thanks the Examiner for the Examiner's comments which have greatly assisted Applicant in responding.

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2. 35 USC Section 102(b)

Claims 1-7 and 9-14 are rejected as being anticipated by Ron R. Hightower, *et al*, "Graphical Multi-scale Web Histories: A Study of PadPrints," ACM HYPERTEXT'98 Conference, Pittsburgh, June 20-24, 1998 (hereinafter Hightower) and Claim 8 is rejected as being anticipated by Benjamin B. Bederson, *et al* "A zooming Web Browser," (1997).

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Applicant respectfully disagrees.

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Applicant respectfully points out to the Examiner that none of the prior art of reference teach or suggest the invention. It should be appreciated that according to the claimed invention, any node/segment can become the focus node/segment and is thus rendered in a special position in the display, and a user can select any node as a new focus, for example by clicking on the node. The prior art of reference do not teach nor suggest such feature. It should also be appreciated that the navigation of the invention is very different from the prior art. In the invention, a user hops from node to node, or segment to segment, making each node become the new focus as one hops to it. Each time one hops to a new node, the portion of the tree below such node, *i.e.* that node's branch, is rendered dynamically to fit that portion of the tree into the rectangular space of the browser optimally. It should further be appreciated that the type of animation of the claimed invention is not found in any of the prior art. Because the invention renders the tree again each time a user clicks a new node to be the focus node, the transition from one layout to the other layout can be jarring unless there is an animation that shows fluidly how each node goes from its position in the old layout to its position in the new layout, as in the claimed invention.

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In contrast, the prior art of reference lays out a tree just once on a canvas. A user zooms in or out of that canvas or pans around, but the layout does not change by navigating or by a new focus node/segment being chosen.

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Applicant has amended the independent claims to further clarify the invention. Support can be found as follows:

(On page 6, line 25 through page 7, line 2)

5 With the invention herein, the user selects which portion of the strategy to display by choosing a branch to display and how many levels of that branch to display. A branch is chosen for display simply by clicking the segment at the top of that branch so that this segment becomes the focus segment.

10 (On page 12, lines 4-9)

An example of this animation is when hopping from the focus segment to one of the focus segment's descendents. A number of the segments visible on the display initially continue to be displayed after the descendant becomes the new focus segment, but they are located in different positions in the display. The  
15 animation shows each of these segments in their original position and gradually migrating to their new position.

Therefore, in view of the above, Applicant is of the opinion that none of the prior art of reference teach all limitations of the claims and that the claims are in condition for  
20 allowance. Accordingly, Applicant respectfully requests that the Examiner withdraw the rejections under 35 USC Section 102(b).

3. It should be appreciated that Applicant has elected to amend the Claims solely for the purpose of expediting the patent application process in a manner consistent with  
25 the PTO's Patent Business Goals, 65 Fed. Reg. 54603 (9/8/00). In making such amendment, Applicant has not and does not in any way narrow the scope of protection to which Applicant considers the invention herein to be entitled. Rather, Applicant reserves Applicant's right to pursue such protection at a later point in time and merely seeks to pursue protection for the subject matter presented in this submission.

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**CONCLUSION**

Based on the foregoing, Applicant considers the present invention to be distinguished from the art of record. Accordingly, Applicant earnestly solicits the Examiner's withdrawal of the rejections raised in the above referenced Office Action, such that a Notice of Allowance is forwarded to Applicant, and the present application is therefore allowed to issue as a United States patent. The Examiner is invited to call (650) 474-8400 to discuss the response.

Respectfully Submitted,



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